

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

JANE DOE,

Plaintiff,

v.

ST. PAUL’S SCHOOL,

Defendant.

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Case No. 1:18-cv-00390-PB

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ASSENTED-TO MOTION TO STAY CASE FOR SIXTY DAYS

Plaintiff Jane Doe respectfully files this assented-to motion to stay this action for sixty (60) days.

1. Counsel for the parties are engaged in active discussions about this case.
2. Plaintiff requests this stay, on consent, in the interest of continuing those discussions.
3. This Court has broad discretion “to stay proceedings[,] ... incidental to the power inherent in every court to control the disposition of the [cases] on its docket with economy of time and effort for itself, for counsel, and for litigants.” *Landis v. North Am. Co.*, 299 U.S. 248, 254 (1936).
4. That standard is satisfied here because the limited stay of proceedings will avoid needless litigation and conserve judicial resources by potentially facilitating an early resolution to the action.
5. Counsel for the parties have conferred, and Defendant assents to this motion.

WHEREFORE, Jane Doe respectfully requests that this Honorable Court issue an Order:

- A. Staying this case and all pending deadlines for sixty (60) days; and

B. Granting such other relief as is just and proper.

Respectfully submitted,

Date: September 10, 2018

/s/ Charles G. Douglas, III
Charles G. Douglas, III (NH Bar. No.669)
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Date: September 10, 2018

/s/ Steven J. Kelly
Steven J. Kelly (*pro hac vice*)

Date: September 10, 2018

/s/ Deborah K. Marcuse
Deborah K. Marcuse (*pro hac vice*)
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Date: September 10, 2018

/s/ Meredith Firetog
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was electronically served via ECF to all counsel of record on this 10th day of September 2018.

/s/ Charles G. Douglas, III
Charles G. Douglas, III